

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

THERESA BASSETT and CAROL
KENNEDY, PETER WAYS and JOE
BREAKEY, JOLINDA JACH and
BARBARA RAMBER, DOAK BLOSS and
GERARDO ASCHERI, DENISE MILLER,
AND MICHELLE JOHNSON,

Plaintiffs,

vs.

RICHARD SNYDER, in his official capacity
as Governor of the State of Michigan,

Defendant.

Case No. 2:12-cv-10038

Hon. David M. Lawson

Mag. Judge Michael J. Hluchaniuk

**PLAINTIFFS' AND DEFENDANT'S STIPULATION REGARDING
AUTHENTICITY AND ADMISSIBILITY OF DOCUMENTS**

Plaintiffs and Defendant, by counsel, stipulate to the authenticity and admissibility of certain documents as follows. Documents are exhibits filed in support of Plaintiffs' Motion for Preliminary Injunction (at docket entries 18, 21 and 47).

1. Ex. F: Attorney General Opinion No. 7171. Defendant will stipulate to its authenticity but not its admissibility.
2. Ex. G-1: January 26, 2011 press release *Agema Calls CSC Ruling "Utterly Irresponsible."* Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Dave Agema on January 26, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.
3. Ex. G-2: January 27, 2011 press release *Lund Calls to Abolish Civil Service Commission.* Defendant will stipulate that the exhibit is a true, correct and authentic copy of the

original issued by Rep. Pete Lund on January 27, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

4. Ex. G-3: March 23, 2011 press release *Agema 'Appalled' by Dems' No Votes*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Dave Agema on March 23, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

5. Ex. G-4: April 19, 2011 press release *Yonker to House Democrats: This is Disgusting*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Ken Yonker on April 19, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

6. Ex. G-5: April 14, 2011 press release *Rep. Hooker 'Shocked' by House Democrats' Failure to Respect Michigan Residents*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Thomas Hooker on April 14, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

7. Ex. G-6: April 14, 2011 press release *Lyons Calls Upholding Civil Service Commission Decision 'Negligent.'* Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Lisa Posthumus Lyons on April 14, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

8. Ex. G-7: March 22, 2011 press release *McMillin: Shame on House Democrats for Backing Irresponsible \$11.4 Million Benefit Increase by Civil Service Commission*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Tom McMillin on March 22, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

9. Ex. G-8: March 22, 2011 press release *Taxpayers Can't Afford Health Care Benefits for Roommates of State Employees*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Earl Poleski on March 22, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

10. Ex. G-9: April 14, 2011 press release *McMillin: Reclaiming Michigan's Future Requires a Team Effort*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Tom McMillin on April 14, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

11. Ex. G-10: April 15, 2011 press release *Attempt to Overturn Irresponsible Civil Service Commission Spending Blocked by House Democrats*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Brad Jacobsen on April 15, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

12. Ex. G-11: March 17, 2011 press release *Rep. Eileen Kowall Confronts Civil Service Commissions' Fiscal Irresponsibility*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Eileen Kowall on March 17, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

13. Ex. G-12: April 15, 2011 press release *Rep. Eileen Kowall Criticizes Failure to Overturn Civil Service Commission's Runaway Spending*. Defendant will stipulate that the exhibit is a true, correct and authentic copy of the original issued by Rep. Eileen Kowall on April 15, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

14. Ex. G-13: September 15, 2011 press release *House Votes against Taxpayer-Funded Healthcare for Roommates*. Defendant will stipulate that the exhibit is a true, correct and

authentic copy of the original issued by Rep. Dave Agema on September 15, 2011. Defendant does not stipulate to its admissibility based on relevance and prejudice.

15. Ex. I: House Fiscal Agency Analysis. Defendant will stipulate to its authenticity and preliminarily to its admissibility but reserves a relevance objection to it.

16. Ex. J: Letter from Rick Snyder, Governor, to Michigan House of Representatives. Defendant will stipulate to its authenticity and admissibility.

17. Ex. K: Senate Fiscal Agency Bill Analysis. Defendant will stipulate to its authenticity and admissibility.

18. Ex. L: State Budget Office, State Spending from State Sources Paid to Units of Local Government. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

19. Ex. M: House Fiscal Agency, Background Briefing: School Aid. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

20. Ex. 3.B: State Correspondence About OEAI Benefits. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

21. Ex. 3.C: Taxation of OEAI Benefits. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

22. Ex. 3.D: Civil Service Commission Meeting Minutes of December 8, 2010. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

23. Ex. 3.E: Insurance Enrollment Analyses. Defendant will stipulate to its authenticity. Defendant does not stipulate to its admissibility based on relevance.

24. Plaintiffs have agreed to withdraw the deposition subpoenas they issued on December 26, 2013 to various Michigan legislators and former legislators and have cancelled those depositions.

Dated: January 23, 2014

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CERTIFICATE OF SERVICE

I hereby certify that on 1-23-14, I electronically filed the foregoing PLAINTIFFS' AND DEFENDANT'S STIPULATION REGARDING AUTHENTICITY AND ADMISSIBILITY OF DOCUMENTS with the Clerk of the Court using the ECF system which will send notification of such to all counsel of record.

s/ Brenda Byrd